



May 16, 2025

**VIA ECF**

Hon. Jessica G.L. Clarke  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**Eric J. Berger**  
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**MEMO ENDORSED**

**Re: *Riverkeeper, Inc. and Save the Sound, Inc. v. National Express LLC and White Plains Bus Co., Inc.***  
**Docket No.: 7:24-cv-09676-JGLC**

Dear Judge Clarke:

This firm represents defendants, National Express LLC and White Plains Bus Co., Inc., in the above-captioned matter.

Please allow this letter to serve as an application for a 60-day adjournment of the (i) May 28, 2025 deadline to submit a proposed Civil Case Management Plan and Scheduling Order and joint letter; (ii) May 21, 2025 Initial Pretrial Conference; and (iii) June 6, 2025 deadline to respond to the Complaint.

As a follow-up to our March 11, 2025 request for an initial extension, the undersigned continues to have discussions with plaintiffs' counsel, Reed W. Super, Esq., regarding the potential for fully resolving the matter before engaging in formal discovery and any responsive pleading or motion practice. As such, all parties agree that a second 60-day adjournment will be beneficial in that it will allow the parties, their counsel and environmental consultants to focus their resources on settlement. The parties are considering whether mediation or a settlement conference would be helpful, but at this time we continue to believe that we can achieve a complete settlement through direct negotiations.

At the end of the 60-day adjournment, the parties would report to the Court on the prospects of reaching a complete settlement expeditiously, and if not, will submit a proposed Civil Case Management Plan and Scheduling Order and joint letter that has been more thoroughly informed by their substantive discussions.

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Thank you for your consideration.

Respectfully submitted,

COZEN O'CONNOR



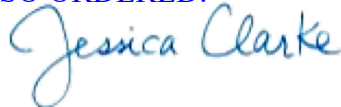
By: Eric J. Berger

cc: *All Counsel via ECF*

Application GRANTED. The conference scheduled for May 28, 2025 is ADJOURNED to **July 30, 2025** at 4:00 p.m. The conference will be held remotely by Microsoft Teams. Counsel will receive Microsoft Teams log-in credentials at the email addresses listed on the docket. The public listen-only line may be accessed by dialing: 646-453-4442 | Access Code: 757578439#. Parties to submit joint status letter and proposed case management plan by **July 23, 2025**. Defendants to respond to the Complaint by **August 6, 2025**.

The Clerk of Court is directed to terminate ECF No. 18.

SO ORDERED.



JESSICA G. L. CLARKE  
United States District Judge

Dated: May 20, 2025  
New York, New York